

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

THE PRUDENTIAL INSURANCE COMPANY
OF AMERICA; PRUDENTIAL BANK AND
TRUST, FSB; and THE GIBRALTAR LIFE
INSURANCE CO., LTD.,

Plaintiffs,

-against-

J.P. MORGAN SECURITIES LLC (f/k/a J.P.
MORGAN SECURITIES INC.); J.P. MORGAN
MORTGAGE ACQUISITION CORPORATION;
CHASE HOME FINANCE, LLC; J.P. MORGAN
ACCEPTANCE CORPORATION I; CHASE
MORTGAGE FINANCE CORPORATION;
CHASE FUNDING, INC.; EMC MORTGAGE
LLC (f/k/a EMC MORTGAGE CORPORATION);
MASTER FUNDING LLC; and BEAR STEARNS
ASSET BACKED SECURITIES I LLC,

Defendants.

No. 2:12-cv-03489-WHW-MCA

STIPULATION

This stipulation is entered into by and between plaintiffs The Prudential Insurance Company of America; Prudential Bank and Trust, FSB; and The Gibraltar Life Insurance Co., Ltd. ("Plaintiffs") and defendants J.P. Morgan Securities LLC (f/k/a J.P. Morgan Securities Inc.); J.P. Morgan Mortgage Acquisition Corporation; Chase Home Finance, LLC; J.P. Morgan Acceptance Corporation I; Chase Mortgage Finance Corporation; Chase Funding, Inc.; EMC Mortgage LLC (f/k/a EMC Mortgage Corporation); Master Funding LLC; and Bear Stearns Asset Backed Securities I LLC ("Defendants") (Plaintiffs and Defendants, collectively, the "Parties").

WHEREAS, Plaintiffs commenced the above-captioned action (the "Action") on April 25, 2012 with the filing of a complaint (the "Complaint") in New Jersey Superior Court in Essex County, New Jersey (the "State Court").

WHEREAS, Defendants removed the Action to the United States District Court for the District of New Jersey (the "Federal Court") on June 11, 2012;

WHEREAS, Plaintiffs filed a motion to remand the case from the Federal Court to the State Court on July 11, 2012 (the "Motion to Remand");

WHEREAS, Plaintiffs have advised Defendants of the existence of additional claims against the Defendants, which arise from additional purchases of mortgage-backed securities by additional Prudential entities not named in the Action (the "Additional Claims");

WHEREAS, Plaintiffs have disclosed a proposed amended complaint (the "Amended Complaint") to Defendants, which Defendants have reviewed;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiffs and Defendants, through their undersigned counsel, as follows:


1. Defendants do not oppose the filing of Plaintiffs' Amended Complaint. Defendants do, however, reserve all rights with respect to the Amended Complaint, including, but not limited to, the right to move to dismiss the Amended Complaint on the ground that claims therein are barred by the applicable statutes of limitation or repose and do not relate back to the existing claims for purposes of determining compliance with the applicable statutes of limitation or repose. Nothing in this Stipulation is intended to, nor shall, affect the timeliness of any of the claims asserted or to be asserted in this matter.

2. The filing of the Amended Complaint shall not affect the briefing schedule currently in place on the pending Motion to Remand.

3. By entering into this Stipulation, neither party waives any rights (including Plaintiffs' objections to federal jurisdiction), and Defendants agree that the filing of the Amended Complaint shall not prejudice any of Plaintiffs' arguments on the pending Motion to Remand.

DATED: August 24, 2012

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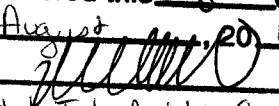
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Corporation), Bear Stearns Asset Backed
Securities I LLC, J.P. Morgan Chase Bank,
N.A. as successor by merger to Chase
Home Finance, LLC*

So Ordered this 28 day
of August, 2012


Magistrate Judge Madeline Cox Arleo